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Attorneys for Plaintiffs RABI YOUSSEFI

**U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

RABI YOUSSEFI, an individual and  
on behalf of all others similarly situated,

Plaintiffs,

vs.

SIMPLE PAYMENTS CORP.; and  
DOES 1-100

Defendant.

Case No.: 3:16-cv-00828-BAS-WVG

**JOINT MOTION FOR DISMISSAL**

*The Honorable Judge Cynthia Bashant*

**TO THE CLERK OF COURT, THE HONORABLE U.S. DISTRICT COURT  
JUDGE, AND ALL PARTIES OF RECORD AND THEIR RESPECTIVE  
ATTORNEYS:**

1       The parties herein—Plaintiff RABI YOUSSEFI (“Plaintiff”) and Defendant  
2 SIMPLE PAYMENTS CORP. (“Defendant”), hereby jointly move for a dismissal of  
3 this matter. The dismissal is to be with prejudice as to Plaintiff RABI YOUSSEFI, but  
4 without prejudice as to the putative class. Each party shall bear its own attorneys’ fees  
5 and costs.

6  
7 Dated: August 19, 2016

Respectfully submitted,

8 SEMNAR & HARTMAN, LLP

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10 By: /s/ Jared M. Hartman  
11 Jared M. Hartman, Esq.  
12 Attorneys for Plaintiffs

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14 MINTZ LEVIN COHN FERRIS  
15 GLOVSKY AND POPEO P.C.

16 By: /s/ Esteban Morales  
17 Joshua Briones, Esq.  
18 Esteban Morales, Esq.  
19 Attorneys for Defendant  
20 SIMPLE PAYMENTS CORP.  
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**PROOF OF SERVICE**

Youssofi v. Simple Payments Corp.

Case No.: 3:16-cv-00828-BAS-WVG

I am employed in the County of San Diego, State of California. I am over the age of 18 and am not a party to the within action; my business address is 400 South Melrose Drive, Suite 209, Vista, California 92081. On the date provided below, I served the foregoing document described below on the interested parties in this action by placing same in a sealed envelope.

**JOINT MOTION FOR DISMISSAL** was served on:

Joshua Briones E. Crystal Lopez Esteban Morales MINTZ LEVIN COHN FERRIS GLOVSKY AND POPEO, P.C. 2029 Century Park East, Suite 1370 Los Angeles, CA 90067 Attorneys for Defendant	
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☐ **(BY MAIL)** – I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States mail in Vista, California.

I am “readily familiar” with the firm’s practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on the same day with postage thereon fully prepaid at Vista, California, in the ordinary course of business. I am fully aware that on motion of the party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one day after the date of deposit for mailing an affidavit.

☐ **(BY FACSIMILE)** – I caused the above described document(s) to be transmitted to the offices of the interested parties at the facsimile number(s) indicated above and the activity report(s) generated by facsimile number (888) 819-8230 indicating on all pages that they were transmitted.

☐ **(BY PERSONAL SERVICE)** – I caused such envelope(s) to be delivered by hand to the office(s) of the addressee(s).

☐ **(STATE)** – I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☒ **(FEDERAL)** – I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made. **Via Electronic Service:** The above-described documents will be delivered electronically through the court’s ECF/PACER electronic filing system, as stipulated by all parties to constitute personal service.

Dated: 08-19-16

/s/ Jared M. Hartman  
 Jared M. Hartman, Esq.